

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

CHASOM BROWN, et al.,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 20-cv-03664-LHK (SVK)

**ORDER FOLLOWING  
SEPTEMBER 30, 2021 DISCOVERY  
HEARING**

Re: Dkt. No. 281

The Court held a discovery hearing by Zoom on September 30, 2021. Based on consideration of the Parties' submissions and arguments at the hearing, the Court **ORDERS** as follows:

1. **Google's Proposed Order Limiting Discovery:** The Court finds it appropriate at this stage of the case and in light of the discovery that has occurred so far to impose limits on discovery. Accordingly, the Parties are to engage in a robust meet and confer in person or by video or phone to reach compromises on those limits. The Parties must file, and submit a Word version by email, a single joint proposed order by **noon on October 8, 2021**. The proposed order should include numbered bullets and interleave the Parties' positions on areas of disagreement.
2. **Privilege Issues (Issues P19/D7):** The Court reminds all Parties of their obligations under Federal Rule of Civil Procedure 26(b)(5)(B) regarding inadvertent production of privileged materials.
  - a. **Clawback Document:** The disputed clawback document identified in the papers is to be submitted for in camera review, along with a joint submission of no more than 2 pages per side, by **noon on October 8, 2021**.

b. Privilege log issues raised by Plaintiffs prior to September 24, 2021: Google to respond to Plaintiffs' issues no later than **October 11, 2021**. Parties to engage in robust meet and confer. Disputes may be submitted to the Court in a Joint Submission in accordance with this Court's standing order no later than **October 18, 2021**. Parties are to reserve **October 27, 2021 at 10 a.m. for an in-person hearing** on privilege disputes and be prepared to participate in further meet and confer in court on that date.

c. Privilege log issues for subsequent productions: Privilege logs for subsequent productions, including the October 6, 2021 production, are to be served no later than **October 27, 2021**. Google is to respond to issues raised by Plaintiffs within **3 business days**.

3. **Issue D9:** Google's motion to compel responses to RFAs 30, 32 and 34 is DENIED.

4. **Issue P12:** See Exhibit A, attached hereto. Where Google is ordered to produce documents, said productions shall be completed by **October 29, 2021**.

**SO ORDERED.**

Dated: October 1, 2021



SUSAN VAN KEULEN  
United States Magistrate Judge